

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

JANE DOE,)
Plaintiff,)
v.) Civil Action
CITY OF DALTON, ETHAN PUGH,) File No.
individually, and CLIFF CASON,)
individually,)
Defendants.)
_____)

DECLARATION OF JANE DOE

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I submit this Jane Doe affidavit in support of my Motion to Proceed Under a Pseudonym and to Seal the Disclosure Statement, which I have executed in the State of Georgia.

2. I was employed as an intern by the Dalton Police Department (“DPD”).

3. While I was employed with the DPD, I was sexually assaulted by Defendant Ethan Pugh in the course of a ride-along.

4. I am seeking to proceed anonymously, as the revelation of my identity in this lawsuit will bring ridicule, personal embarrassment, shame, and humiliation to both me and my family.

5. I was born and raised in North Georgia, where my family has lived for many generations.

6. My family raised me in the Baptist faith—a faith that I hold dear.

7. My family and I are devout Baptists, and I adhere to those traditions.

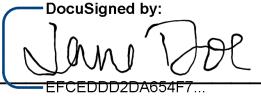
8. I am deeply enmeshed in my Baptist church community, where I regularly attend activities, often multiple time per week.

9. The mandate in my religious community is that I will not engage in the kind of sexual activity that Defendant Pugh subjected me to until marriage.

10. The revelation of the sexual conduct to which Defendant Pugh subjected me to may thus bring shame and humiliation upon me and my family in our religious community.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 7th day of July, 2021.

DocuSigned by:

Jane Doe
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